

	Connecting for Health Common Framework	Washington State Health Information Infrastructure Requirements	Connecting for Health Common Framework											
	Policy Guides		Description	Framework Privacy Principles (2= OECD, 3= Canada)										
P2	Model Privacy Policies & Procedures for HIE		A foundational policy architecture for privacy and health information technology in a networked environment, based on nine principles. The Connecting for Health approach dictates that these nine principles be balanced to avoid emphasizing some over others in a way that would weaken the approach.	Patients Own Their Own HI	Individual Participation (2) & Control (3)	Openness (2,3) & Transparency	Purpose Specification (2,3) & Minimization	Collection Limitation (2,3)	Use Limitation (2,3)	Data Integrity (3) & Quality (2,3)	Security Safeguards (2,3) & Controls	Accountability (2,3) & Oversight	Remedies	Retention (3)
SNO Policy 100	Compliance with Law & Privacy	<u>Privacy, Confidentiality, & Security</u>	Participants comply with applicable law and SNO policies. Participants promulgate the internal policies required for such compliance. The policy that is the most protective of individual privacy should govern decision making. Participants may enhance privacy protection where appropriate.	x		x				x		x	x	
SNO Policy 200	Notice of Privacy Practices	<u>Privacy, Confidentiality, & Security</u>	Incorporates HIPAA requirements obligating entities to provide individuals a notice of the entities privacy practices. The policy exceeds HIPAA requirements by also requiring disclosures to individuals of certain information related to the SNO and RLS. The policy applies to all participants that have registered with and are participating in the SNO and RLS and that may provide and or make available health information through the SNO and the RLS.	x	x	x	x	x	x					
SNO Policy 300	Individual Participation & Control of Info. Posted to RLS		Allows individuals to elect whether or not to have information about them included in the RLS. Individuals are treated as participants in the process of health information collection and dissemination rather than as spectators. Includes sub-policy statements : Choice Not to Have Information Included in the RLS; Effect of Choice; Revocation; Documentation; Participant Choice; Provision of Coverage or Care.	x	x		x	x	x					

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SNO Policy 400	Uses & Disclosures of Health Information	Functions, Privacy, Confidentiality, & Security	All uses will be consistent with applicable State, Federal and local laws and regulations. Restricts the purposes for which the Participant may request PHI. Permissible purpose must be stated with request for information. Includes pertinent policies re: SNO Policies; Participant Policies; Accounting Disclosures; Audit Logs; Authentication; Access				x	x	x		x			
SNO Policy 500	Information Subject to Special Protection	Functions	This provision facilitates individualized privacy protections by requiring Participants to heed any special protections of certain information set forth under applicable law.	x	x		x	x	x	x	x			
SNO Policy 600	Minimum Necessary	Function	Incorporates the HIPAA requirement that entities may disclose only the amount of information that is reasonably necessary to achieve a specific purpose. The policy exempts treatment disclosures from this minimum necessary requirement to balance the protection of privacy and the provision of quality health care. Includes sub-policy statements re: Uses; Disclosures; Requests; Entire Medical Record					x	x	x	x			
SNO Policy 700	Workforce, Agents, & Contractors	Functions	This recommended model policy advances privacy principles .						x	x	x	x	x	
SNO Policy 800	Amendment of Data	Functions	Allows individuals to verify the accuracy and completeness of information concerning them		x	x				x		x		
SNO Policy 900	Requests for Restrictions	Functions, Privacy, Confidentiality, & Security	Requires participants who agree to individuals' requests for restrictions in accordance with HIPAA Privacy Rule to comply with such request with regard to the release of information.		x				x			x		

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